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Question No.	Report Reference	Question	Response
1. WCOM/E&Y	General	Explain how E&Y captured the transaction data used in its testing. Specifically, where and how was data captured?	E&Y requested the entire population of transactions (i.e. orders, LSRs, pre-order queries, etc.) in the testing period from the source systems or databases in which the transactions were captured. The files were downloaded by SBC personnel and sent via e-mail, burned to CD or File Transfer Protocol (FTP) to an SBC server to which E&Y had access.
2. WCOM/ E&Y	General	How many EDI transactions did E&Y evaluate? Where was this data captured? How did E&Y determine that these transactions were actually sent by CLECs?	For Pre-Order LSOG4 EDI we tested 260 transactions. For Ordering we tested the following number of LSOG4 transactions: For FOCs we tested 235 from MOR/LASR For "completions" we tested 265 from MOR. For "rejects" we tested 200 from

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		Follow-up 1: Can you tell us what specific controls are applied between the CLEC order and SBC for EDI LSOG4 going through ARAF?	MOR/LASR. For "line-loss) we tested 255 from MOR/LASR. Depending on the transaction type there were different fields that identified that the transaction was sent by a CLEC. When a CLEC sends a file to AIT (EDI), EDI sends a response to the CLEC that confirms a file was received. The EDI system sends a "system message" that confirms the file/order was received between the CLEC and AIT. This system message must be received in order for the translator to process the file/orders. If the transaction does not translate, the orders fallout into an error queue for review and analysis. This queue is monitored by AIT personnel to ensure processing by the translator. After the data transmissions are accepted, the translator provides a formatting service for CLEC orders to ensure the fields of the submitted order are aligned with the fields in LASR/MOR. The translator assigns the proper address to ensure

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			delivery to LASR or MOR. This control ensures the integrity of the CLEC data when processed by the downstream systems. The Translator has logs of CLEC data as a backup procedure if errors occur. This backup procedure allows for reprocessing because of a system failure. The middleware MQ Series is used as the transport to get the orders from the translator to LASR/MOR. MQ Series has automated controls that ensure that all files sent are received by the connecting systems. The middleware M-Queue has thresholds established to monitor the traffic between sending and receiving systems. If time thresholds receipts are exceeded the monitoring application PATROL triggers a response that pages the support group to notify the Production Support Team. MOR submits notifications when data is sent or received from initiating system in the form of an acknowledgement through the M-Queue. MOR sends acknowledgements in the form of a FOC, Reject, Positive, or Manual

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			confirmations.
		Follow-up 2: Disagregate the GUI and the version number of EDI transactions (order and preorder) sent by electronic data interchange protocol, through ARAF and into SBC LSOG4, LSOG5, and LSOG1.	This information is not readily available in our workpapers.
3. WCOM/ E&Y	General	Explain the business rules interpretation process. How/where did E&Y document the differences in interpretation? How did E&Y determine that CLECs were aware of and understood the differences?	

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4. WCOM/ E&Y	General	Explain the method by which E&Y recalculated the metrics to determine they were correctly calculated. If the calculator itself was broken (e.g., the program added an additional value), how would the E&Y process have discovered it?	Answered during testimony.
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5. WCOM/ E&Y	General	Has E&Y satisfied itself that SBC's metrics controls are adequate to ensure on-going correct statements of result?	Answered during testimony.
6. WCOM/ E&Y	General	How, when, where did E&Y learn how CLECs submit orders and receive information back from SBC regarding those orders? What local service ordering and provisioning experts did E&Y employ in its evaluation of the SBC metrics?	How - Through interviews with SBC subject matter experts, operational documentation, site visits, business rules (FOC, SOC, and Jeopardy PMs), walkthroughs of operational control and processes pertaining to the stipulated PMs. When - Over the course of our fieldwork. Where - Depending on the process under review, some were site visits at various locations. E&Y did not employ any outside local service ordering and provisioning experts as it pertained to the PMs included in the scope of our review.

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7. WCOM/ E&Y	General	Did E&Y submit any of its own transactions in this evaluation. If so, how many? If not, how did E&Y complete its transaction review? Where did it find these transactions?	Answered during testimony.
8. WCOM/ E&Y	General	How did E&Y validate that the changes/corrections to SBC systems to resolve E&Y concerns/exceptions were made? Did E&Y reissue/reevaluate transactions in months after corrections to establish that the corrections had actually been made?	Answered during testimony.
9. WCOM/ E&Y	General	Has E&Y had any meetings or communications with BearingPoint discussing the work that E&Y has done to audit the SBC metrics? Please explain the purpose of the meetings/communications and describe similarities and differences between the E&Y and BearingPoint processes.	Answered during testimony.

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10. WCOM/ E&Y	General	Is the Illinois E&Y report on metrics unqualified?	No.
11. WCOM/ E&Y	General	Has E&Y conducted any 3 rd party testing of Operations Support Systems for any Incumbent Local Exchange Carriers ("ILECs") other than SBC? If so, who? Did these companies receive qualified or unqualified reports?	E&Y is in the process of performing performance measure attestation examination at Sprint and Verizon. Final reports have not yet been issued.
12. WCOM/ E&Y	General	What data did E&Y review to determine that SBC is accurately billing CLECs for the services they purchase? Did E&Y review specific CLEC bills? If so, which bills? Did E&Y review transaction data to determine billing accuracy?	Only two Performance Measures (PM 14 – Billing Accuracy, PM 15 – Bill Format) are related to accuracy of a bill that a CLEC may receive. PM 14 requires Ameritech to report the results of their own bill audit process in the following format (# of elements not corrected prior to bill release divided by the total elements audited). E&Y tested that the Company was reporting the results of this bill audit process as required by the PM Business Rules. This was done in the

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			following manner:
			Resale Monthly Recurring/Non-Recurring - For USOC accuracy SBC randomly samples USOC COS (class of service) monthly to ensure that the rate that will appear on the bill is reflected in the rate tables. E&Y tested a sample of USOC COS that appeared on the SBC sample to verify that the USOC COS rate on the USOC Report (representative of USOC COS on actual CLEC bill) equaled the USOC COS rate in the master rate tables. During this testing, E&Y noted that the Company did not retain all appropriate data to effectively test the sample selected each month to perform the bill audit. Once the Company corrected this data retention issue, E&Y verified that all data was available to the Company's bill auditors to perform the monthly bill audit (Section II, Issue 41 in our report). Resale Usage/Unbundled Local Switching and Other Unbundled Network Elements validation

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			is a completely automated process. As such, code review was utilized to evaluate the validation process. Code review noted that the automated processes performing the USOC validation process were functioning in accordance with the business rules.
			For PM 15, specific CLEC bills were utilized to validate bill format. PM 15 validates that bill format (totaling, syntax) are accurate. E&Y selected bills and performed steps (recalculation) to ensure that the bill was properly formatted.

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13. WCOM/ E&Y	General	Why is the E&Y issues log considered confidential? Does E&Y consider this log to be similar to the BearingPoint exceptions and observations findings? If CLECs were billed for the wrong Universal Service Order Codes ("USOCs") (i.e., products services and features), or for the wrong number of transactions, or the incorrect rate for a particular product or service, would this error be visible in the metrics? Does E&Y's "pan" on the billing metrics mean that SBC is billing correctly or simply that it is calculating its internal metrics correctly?	Our workpapers are proprietary and are not public documents. The scope of our engagement is the accuracy and completeness of the Company's performance measures in compliance with the Business Rules. To the extent that a PM business rule is not designed to catch a particular type of error, it would not be included in the scope of our engagement.
14. WCOM/ E&Y	General	The E&Y attestation states that E&Y used version 1.8 of the SBC business rules. Where did E&Y obtain these business rules?	Answered during testimony.

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15. WCOM/ E&Y	General	In Michigan, E&Y stated that it used a version of the business rules being circulated as part of the so-called six month review metrics collaborative. Did E&Y use that version of the business rules in its Illinois evaluation? If so, when/how when did E&Y obtain this version of the business rules, and exactly what version did it use (e.g., has the version that E&Y used changed as the six month review collaborative has progressed)?	Answered during testimony.
16. WCOM/ E&Y	General	In some of the responses to the issues raised in the E&Y confidential issues log, SBC states that current calculations are following the rules that CLECs will agree to at the end of the current metrics collaboratives. Is this E&Y's understanding?	Answered during testimony.

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17.	General	If 16 is correct, when did SBC begin using the "new" business rules? How was this information (the fact that the business rules in effect were the ones that "would" be agreed to in the future) communicated to CLECs and the ICC?	Answered during testimony.
18.	General	What independent investigation did E&Y undertake to determine that CLECs understood that the new rules had already been implemented? How did E&Y determine that CLECs and the ICC had agreed to the new rules?	Answered during testimony.

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19.	General	What is E&Y's understanding of a diagnostic PM? If SBC is miscalculating a diagnostic PM, what is the impact to CLECs? If E&Y believes that there is an impact, why did it simply accept SBC's answer that diagnostic PMs don't matter and their miscalculation would not represent an exception?	Answered during testimony.
20.	General	What specific limitations did SBC put on E&Y in this engagement? Did SBC direct E&Y to keep the issues log secret? Did SBC direct E&Y to ignore the BearingPoint exceptions? Did SBC ask E&Y to ignore diagnostic measures? Did SBC specify the months to be evaluated?	Answered during testimony.

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21.	General	E&Y conducted a number of site visits to review transactions. How many discussions did E&Y have with CLECs to understand the process used to submit orders and process responses?	Answered during testimony.
N/A	Ordering	What types of transactions can be sent via email to SBC?	Requests for collocation

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N/A	General	Provide the business rule number that shows the exception that says an accessible letter, the modifications to a change that impacts the documentation or coding is not counted by AIT in their metrics.	PM MI 15 measures the timeliness of notification of the CLECs by the Company of changes (i.e. notifications regarding final business requirements) to interfaces maintained by the Company to support OSS connectivity with the CLECs. Changes to the final requirements made after notification of the CLECs but prior to release are communicated through accessible letters called exception letters (i.e. exceptions to final business requirements). If CLECs do not object to the change made to the final business requirements described in the exception letter, the exception letter is considered an "approved exception" letter. The business rules allow "approved exceptions" to be excluded from the results. The Company was not previously excluding "approved exception" letters as noted in Issue I – 52 but has since changed its process to exclude these letters from results.

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N/A	General	Provide the last specific month that E&Y reevaluated the data for Attachment A exceptions.	The majority of corrective action testing performed by E&Y related to exceptions in Attachment A of the Report of Management was conducted utilizing September, October or November 2002 data.
N/A	Billing	Exception 41, pg 21 Attachment A, How does data retention policy solve this exception?	SBC has implemented a new process retaining USOC Reports used for resale bill validation. The new process requires the USOC Reports (contain USOC COS that appear on CLECs bills) to be retained for 90 days. Before the process change the retention period was for a maximum of 30 days. Thus, a validator could only research back approximately one month preventing all USOC's that appeared on a bill from being located to agree back to the Master Rate Tables. The new process increases the assurance that the reports are available to the bill validators for validating all Statistical Sample Listings generated for the month.